



City of Salisbury
North Carolina

DOCKET FILE COPY ORIGINAL

March 29, 1993

RECEIVED

APR 2 1993

FCC - MAIL ROOM

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: PR Docket Number 92-235

Dear Ms. Searcy:

The following comments in the matter of PR Docket 92-235 represent the position of the City of Salisbury.

We are in agreement with the intent to increase the number of PLMRS channels by dividing existing channels into narrower segments. However, we feel that many aspects of the proposal will pose major problems for public safety. Areas of concern include:

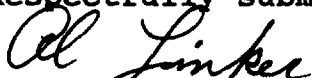
- * Loss of public safety exclusive channel assignments in the 150 to 160 MHz band. Due to channel usage requirements and funding methods public safety agencies will not have fair access to General Category Pool assignments.
- * Proposals to interleave services which will destroy the integrity of public safety block allocations. These proposals will cause problems in the areas of frequency coordination and adjacent channel interference. We recommend that channels in the 150-174 MHz band be assigned to public safety in exclusive blocks.
- * Proposed 5 kHz channel width in the 150/160 MHz band. Such operation has yet to be successfully demonstrated. We concur with APCO Inc.'s recommendation to adopt 6.25 kHz as the ultimate goal for the bandwidth in all bands.
- * Power limitation based on HAAT and ERP. These limitations

* Potential loss of mobile relay assignments in the 150/160 MHz band. Mobile relays in this band are vital to communications for many public safety agencies in North Carolina.

We also recommend that the Commission take advantage of the rule rewrite to develop separate rules for public safety.

Please consider the City of Salisbury as a party of interest in this matter, and include our comments as part of the official record.

Respectfully submitted,



Al Linker
Telecommunications Manager
City of Salisbury
PO Box 479
Salisbury, NC 28145-0479